

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**Specialty Application Services Inc  
Specialty Application Services Inc - Port Allen Facility  
Port Allen, West Baton Rouge Parish, Louisiana  
Agency Interest Number: 11059  
Activity Number: PER20090001  
Proposed Permit Number: 3120-00073-V0**

**I. APPLICANT**

**Company:**

Specialty Application Services Inc - Port Allen Facility  
PO Box 30  
Port Allen, Louisiana 70767-0030

**Facility:**

Specialty Application Services Inc  
1331 Hwy 190 W  
Port Allen, West Baton Rouge Parish, Louisiana

Latitude      30      30      19.14      Longitude      91      13      11.07

**II. FACILITY AND CURRENT PERMIT STATUS**

Specialty Application Services, Inc., (SAS) owns and operates a blasting and coating yard in Port Allen. The activities on site involve cleaning, blasting, and coating of new pipes, structural steel, and vessels. Abrasives are stored in three silos. Painting and surface preparations (sandblasting) are conducted outside but within a twenty five-foot high fabric or screen enclosed area, Emission Points 1-00 and 2-00.

After abrasive blasting, the pipes are inspected and prepared for coating per customer specifications. Coated pipes are air dried at ambient temperature.

Two diesel-fired compressor engines, Emission Points 3-00 and 4-00, rated at 275 and 250 horsepower, respectively, are used to power the blasting nozzles and the coating spray guns.

Specialty Application Services Inc - Port Allen Facility is a designated Part 70 source.

**Specialty Application Services Inc  
Specialty Application Services Inc - Port Allen Facility  
Port Allen, West Baton Rouge Parish, Louisiana  
Agency Interest Number: 11059**

## **PROPOSED PROJECT/PERMIT INFORMATION**

### **Application**

A permit application was submitted on December 31, 2008 requesting a Part 70 operating permit for Specialty Application Services Inc - Port Allen Facility. The application was subsequently revised on September 14, 2009. Additional information dated December 10, 2009, January 13, and January 27, 2010 was also submitted.

### **Project**

Specialty Application Services, Inc. proposes the following actions:

1. Obtain a Part 70 Operating permit for its Port Allen Facility,
2. Increase the usage of blasting material at the facility from 3,000 to 5,840 tons/yr,
3. Increase the total paint/thinner/solvent throughput from 103000 to 451632 lbs/yr, and
4. Update the emissions using the most recent approved methods.

### **Proposed Permit**

Permit 3120-00073-V0 will be the initial Part 70 operating permit for the Specialty Application Services Inc - Port Allen Facility.

### **Permitted Air Emissions**

Estimated emissions in tons per year are as follows:

Pollutant	Emissions in tons per year		Change
	Before	After	
PM <sub>10</sub>	12.40	29.62 <sup>1</sup>	+ 17.22
SO <sub>2</sub>	0.65	1.30	+ 0.65
NO <sub>x</sub>	9.88	19.77	+ 9.89
CO	2.13	4.26	+ 2.13
VOC	24.28	80.63	+ 56.35 <sup>2</sup>
Xylenes	0.55	24.17	+ 23.62 <sup>3</sup>
TAPs	7.52	45.62 <sup>4</sup>	+ 38.10

<sup>1</sup>Includes 0.05 ton of zinc and compounds, non-VOC TAPs.

<sup>2</sup>Increase is above the NNSR major stationary source threshold. However, this change is not considered a physical change or change in the method of operation per LAC 33:III.504.K - Major Modification- c.vi.

<sup>3</sup>Exceeds the MER

<sup>4</sup>Permittee may use any TAP not listed in the permit as long as it is below its MER and this total of TAPs is not exceeded.

**Specialty Application Services Inc**  
**Specialty Application Services Inc - Port Allen Facility**  
**Port Allen, West Baton Rouge Parish, Louisiana**  
**Agency Interest Number: 11059**

#### IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

##### Applicability and Exemptions of Selected Subject Items

ID No.	Requirement	Note
UNF001 - Facility-wide	40 CFR 63 – Subpart Mmmm–National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.	Operate and maintain the affected source, including all air pollution control and monitoring equipment used for the purposes of complying with 40 CFR 63 Subpart Mmmm, according to the provisions in 40 CFR 63.6(e)(1)(i). Subpart Mmmm
	LAC 33.III.504 – Nonattainment New Source Review [LAC 33:III.504]	DOES NOT APPLY. The facility, while a major source according to NSR, the changes at the facility are not considered a physical change or change in the method of operation per LAC 33 III.504.K – Definitions - Major Modification-c.vi.
	Control of Emissions of Nitrogen Oxides (NO <sub>x</sub> ) [LAC 33:III.2201]	DOES NOT APPLY. Facility does not have any affected point sources.
	Chemical Accident Prevention Provisions [40 CFR 68]	DOES NOT APPLY. Facility has less than threshold amounts of regulated substances.
ARE001 – Coating Metal Surface	40 CFR 63 – Subpart Mmmm–National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products	High performance coating operations: Organic HAP <= 27.5 lb/gal (3.3 kg/L) coating solids used during each 12-month compliance period. Subpart Mmmm. [40 CFR 63.3890(a)(2)]
EQT006 and EQT007 3-00 Diesel Compressor Engine XP825 and 4-00 Diesel Compressor Engine XP750	40 CFR 60- Subpart IIII-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.	DOES NOT APPLY. Units have not been constructed, modified or reconstructed after July 11, 2005.
	Control of Emissions of Nitrogen Oxides (NO <sub>x</sub> ) [LAC 33:III.2201]	EXEMPT. Units are diesel-fired stationary internal combustion engines [LAC 33:III.2201.C.14].

**Specialty Application Services Inc  
Specialty Application Services Inc - Port Allen Facility  
Port Allen, West Baton Rouge Parish, Louisiana  
Agency Interest Number: 11059**

EQT006 and EQT007 3-00 Diesel Compressor Engine XP825 and 4-00 Diesel Compressor Engine XP750	LAC 33:III.1101 – Control of Air Pollution from Smoke	Comply with opacity $\leq$ 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1101.B]
FUG003 – FUG005 5-00 Sand Storage Silo No.1 – 7-00 Sand Storage Silo No.3	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.[40 CFR 60.110b]	DOES NOT APPLY. Storage tank does not store petroleum liquids.
	LAC 33:III.1305 – Control of Fugitive Emissions	Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A.1-7. [LAC 33:III.1305]

**Prevention of Significant Deterioration/Nonattainment Review**

NA

**Streamlined Equipment Leak Monitoring Program**

NA

**MACT Requirements**

NA

**Air Quality Analysis**

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

**Specialty Application Services Inc  
Specialty Application Services Inc - Port Allen Facility  
Port Allen, West Baton Rouge Parish, Louisiana  
Agency Interest Number: 11059**

**General Condition XVII Activities**

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

**V. PERMIT SHIELD**

There is no permit shield in this permit.

**VI. PERIODIC MONITORING**

- Monitor the individual and combined totals of toxic air pollutants (TAPs) upon each occurrence. These TAPs shall be calculated using the same method used in estimating these emissions in the permit application (MSDS sheet).

**Specialty Application Services Inc  
Specialty Application Services Inc - Port Allen Facility  
Port Allen, West Baton Rouge Parish, Louisiana  
Agency Interest Number: 11059**

## **VII. GLOSSARY**

**Carbon Monoxide (CO)** – A colorless, odorless gas, which is an oxide of carbon.

**Maximum Achievable Control Technology (MACT)** – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

**Hydrogen Sulfide (H<sub>2</sub>S)** – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

**New Source Review (NSR)** – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

**Nitrogen Oxides (NO<sub>x</sub>)** – Compounds whose molecules consist of nitrogen and oxygen.

**Organic Compound** – Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

**Part 70 Operating Permit** – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit:  $\geq 10$  tons per year of any toxic air pollutant;  $\geq 25$  tons of total toxic air pollutants; and  $\geq 100$  tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

**PM<sub>10</sub>** – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

**Potential to Emit (PTE)** – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

**Prevention of Significant Deterioration (PSD)** – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality

**Specialty Application Services Inc  
Specialty Application Services Inc - Port Allen Facility  
Port Allen, West Baton Rouge Parish, Louisiana  
Agency Interest Number: 11059**

Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO<sub>2</sub>) – An oxide of sulfur.

Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.